REMARKS

I. Introduction

Claims 1-40 are pending in the present application. Claim 29 has been amended for purposes of clarification. In an October 6, 2005, Office Action (herein "Office Action"), Claims 1-40 were rejected. The Office Action rejected applicants' Claims 1-16, 19, 23-27, and 37-40 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,982,362 to Crater et al. (hereinafter "Crater"). Additionally, the Office Action rejected applicants' Claims 17 under 35 U.S.C. § 103(a) as obvious over Crater in view of U.S. Patent No. 6,698,021 to Amini et al. (hereinafter "Amini"). Claims 18 and 20 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Amini and further in view of U.S. Patent No. 5,732,232, issued to Brush, II et al. (hereinafter "Brush"). Claims 21 and 28 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of U.S. Patent No. 6,504,479, issued to Lemons et al. (hereinafter "Lemons"). Claim 22 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of U.S. Patent No. 5,758,340, issued to Nail (hereinafter "Nail"). Claims 29-31 and 35-36 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of U.S. Patent No. 6,499,054 issued to Hesselink et al. (hereinafter "Hesselink"). Claims 32 and 34 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink and further in view of Lemons. Claim 33 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink and further in view of U.S. Patent No. 5,086,385, issued to Launey et al. (hereinafter "Launey").

For the following reasons, applicants respectfully submit that Claims 1-40 are not anticipated by Crater and are not obvious over Crater in view of Hesselink, Amini, Brush, Lemons, Nail, or Launey because the prior art, alone or in combination, fails to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device.

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Prior to discussing more detailed reasons why applicants believe that all of the claims of the present application are allowable over the cited references, a brief description of the present invention and the cited references is presented.

A.   Summary of the Present Invention

The present invention is related to a system and method for interacting with a remote device. More particularly, a premises server obtains a request corresponding to controlling one or more identifiable remote devices. In response to the request, the premises server dynamically generates a graphical user interface operable to control the remote devices. Control of the remote devices can include accessing the remote device and issuing instructions. Thereafter, the premises server obtains user initiated control instructions from the graphical user interface. The premises server then transmits remote device control data corresponding to the user control instructions, and obtains remote device data generated by the remote device.

In one example of the present invention, a system and method for dynamically generating a user interface for controlling at least one remote device is provided through a central server in communication with the remote device. In accordance with the embodiment, an authorized user accesses the premises server via a central server and requests access to monitoring device data or other integrated information system data. The premises server then dynamically generates a graphical user interface to be viewed by the user via the client computing device.

Numerous advantages may be realized by the system and method recited in the claims of the present application. In one aspect, the utilization of the dynamically generated user interfaces allows graphical user interface generation to be centralized in a server associated with a number of discrete monitoring devices in the monitored network. In another aspect, the centralized nature of the server allows software fixes or updates to the server or servers to be realized immediately throughout the monitoring network, instead of installing software on each

and every monitoring computer in the network. Additional advantages may also be realized within embodiments of the present invention.

B.   U.S. Patent No. 5,982,362 to Crater et al.

Crater is purportedly directed towards an integrated control system comprising one or more controllers each equipped to perform a control function to gather data relevant to the control functions. In accordance with the teachings of Crater, each controller includes computer storage for transmitting one or more pre-configured web pages. The web pages include, among other data, applet instructions that cause a properly equipped remote monitoring computer to display data in a dynamic fashion, or hyperlinks to other web pages, objects or applets. Once a user requests information related to a controller, the remote computer generates a visual display corresponding to the pre-configured web pages. Nevertheless, Crater fails to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device. Crater also fails to teach or suggest obtaining a request to control at least one pre-selected remote device from a remote device by a central server.

C.   U.S. Patent No. 6,499,054 to Hesselink et al.

Hesselink is purportedly directed toward the control of physical processes in a laboratory via a computer network. (Col. 1, lines 10-13). As defined in Hesselink, "physical processes" are "physical, biological, and/or chemical processes" that occur within a laboratory setting. (Col. 4, lines 2-4). Hesselink teaches that a client computer communicates over a network with a connection server. (Col. 4, lines 38-40; FIG. 1B). The connection server in turn communicates with a lab server. (Col. 4, lines 60-63; FIG. 1B). Hesselink further teaches that the lab server broadcasts data from the physical processes and controls the physical processes based on requests from the client computers. (Col. 4, lines 49-54). Nevertheless, Hesselink fails to teach or suggest generating a graphical user interface responsive to a request for controlling a remote

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device. Further, Hesselink fails to teach or suggest obtaining a request to control at least one pre-selected remote device from a remote device by a central server.

II.   The Claims Distinguished

A.   Claims 1, 25, and 37

For purposes of this discussion, independent Claim 1, 25, and 37 will be discussed together because the limitations discussed herein are similar for each claim. Claim 1 reads as follows:

1.   A method for interacting with a remote device comprising:

obtaining a request corresponding to controlling at least one identifiable remote device;

generating a graphical user interface responsive to said request, the graphical user interface being operable to control the remote device, wherein controlling said device includes accessing said remote device and issuing instructions;

obtaining user control instructions from said graphical user interface;

transmitting remote device control data corresponding to said user control instructions; and

obtaining remote device data generated by said remote device.

Similarly, Claim 25 reads as follows:

25.   A computer-readable medium having computer-executable components for dynamically interacting between at least one remote device and a computing device, comprising:

a user interface application operable to dynamically generate a graphical user interface corresponding to the remote device in response to a request for interaction with the remote device;

a device interface application operable to obtain device data from the remote device, and operable to manipulate said data; and

a data transmittal application operable to transmit said data to the computing device, and to facilitate communication between the remote device and the computing device.

Claim 37 reads as follows:

37.   A system for dynamically generating a user interface for controlling at least one remote device comprising:

at least one remote device operable to receive control commands and to transmit monitoring data based on said control commands;   .

a server computer in communication with said remote device, said server computer operable to dynamically generate a graphical user interface based on said remote device;

a client computer in communication with said server computer, said client computer operable to display said graphical user interface, and request said control commands.

As recited above, Claims 1, 25, and 37 are directed to a system and method for interacting with a remote device. Each of the claims recites the generation of a graphical user interface in response to a user request. Specifically, Claim 1 recites, "generating a graphical user interface responsive to said request, the graphical user interface being operable to control the remote device." Claim 37 recites, "said server computer operable to dynamically generate a graphical user interface based on said remote device." As recited in Claims 1, 25, and 37, the invention facilitates the centralized generation of graphical user interfaces associated with a request to access discrete monitoring devices in a monitored network. The centralized server configuration mitigates the need to maintain device-specific user interfaces at each monitoring computer in the network. Additionally, the centralized nature of the server allows software fixes or updates to be centrally processed in the monitoring network.

Crater does not teach generating a graphical user interface responsive to a request for controlling a remote device. Instead, Crater purportedly teaches a system in which individual controllers maintain pre-determined or pre-configured web pages 40 with a set of applets for

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monitoring a specific device. When loaded on a monitoring computer 50, the pre-determined or pre-configured web pages 40 allow for the passive display of data via a browser. (Col. 8, lines 19-37). However, because the pre-configured web pages are device specific, Crater teaches that the controller would maintain a predefined set of applets for an attached device with each web page and would provide the predefined set of applets with the web page to a remote monitoring computer. (Col. 8, lines 26-33). The same web page with the predefined set of applets would be transmitted to the remote monitoring computer in response to each remote monitoring computer request. (Col. 8, lines 32-33). Crater in no way teaches the configuration of a web page that is responsive to the user request (e.g., based on the devices the user would wish to access). Accordingly, Crater does not teach the actual generation of an interface based upon a request from a monitoring station.

As described above, Crater does not teach generating a graphical user interface responsive to a request for controlling a remote device. More specifically, Crater teaches that the querying computer allows for observation of data from pre-determined web pages stored on a controller that are copied to a browser:

> In a working system, the network interface 30 sub1, 30 sub2, etc. of every controller in the system is constantly active and in communication with network 55, facilitating access by computer 50 to any controller-based web page(s) at any time. In this way, computer 50 can *examine* the data associated with any controller merely by specifying the appropriate URL of the controller's primary web page. The web page (and, preferably, an applet associated therewith) *is copied* to browser 57 and displayed along with the relevant, timely data.

(Col. 10, lines 38-43, emphasis added). Because Crater teaches that querying computers are used to examine data, and further teaches that web pages are copied to a browser, Crater clearly does not teach the actual generation of an interface based upon a request to control a remote device.

As stated above, Claims 1, 25, and 37 recite "generating a graphical user interface responsive to said request." Because Crater transmits the same device specific web page

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containing the same predefined set of pre-configured applets for each request, Crater does not generate a graphical user interface in response to a monitoring request. The Office Action contends, however, "that Crater does teach generating a graphical user interface responsive to said request." (Office Action, p.16). As shown above, Crater transmits the same device specific web page containing the same predefined set of pre-configured applets that are not responsive to a request. Accordingly, Crater does not teach generation of a graphical user interface in response to a monitoring request.

Under Section 102(e), a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987) (February 2003). Applicants respectfully submit that Crater fails to expressly or inherently teach, disclose, or suggest each and every element of Claims 1, 25, and 37. As explained above, Crater fails to disclose or suggest generating a graphical user interface responsive to a request for controlling a remote device. Accordingly, applicants respectfully request withdrawal of the pending rejection under 35 U.S.C. § 102 with regard to Claims 1, 25, and 37.

B.   Claim 29

Claim 29, as amended for purposes of clarification, reads as follows:

29.   In a computer system including a remote device in communication with a central server via a communication network, a method for dynamically generating a graphical user interface for controlling at least one pre-selected remote device comprising:

obtaining a request to control at least one pre-selected remote device from a remote device by a central server and selecting one or more program modules corresponding to said request to control at least one pre-selected remote device from a plurality of program modules in response to said request, said one or more program modules operable to control said remote device; and

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transmitting a screen interface with said one or more program modules, wherein said screen interface containing said one or more program modules is operable to generate a graphical user interface when loaded within a browser application on the remote device.

As recited above, Claim 29 is directed to a method for dynamically generating a graphical user interface for controlling at least one pre-selected remote device. Claim 29 further recites "obtaining a request to control at least one pre-selected remote device from a remote device by a central server and selecting one or more program modules corresponding to said request to control at least one pre-selected remote device from a plurality of program modules in response to said request, said one or more program modules operable to control said remote device." Claim 29 further recites that a screen interface is transmitted with the selected one or more program modules and generates a graphical user interface when loaded within a browser application. As recited in Claim 29, the invention facilitates the centralized generation of graphical user interfaces associated with a request to access discrete monitoring devices in a monitored network. The centralized server configuration mitigates the need to maintain device-specific user interfaces at each monitoring computer in the network. Additionally, the centralized nature of the server allows software fixes or updates to be centrally processed in the monitoring network.

As discussed above in relation to Claims 1, 25, and 37, Crater clearly does not teach generating a graphical user interface responsive to a request for controlling a remote device. Thus, Crater could not further teach "generating a graphical user interface for controlling at least one pre-selected remote device" as recited in Claim 29. Likewise, Hesselink does not teach generating a graphical user interface for controlling at least one pre-selected remote device. Rather, Hesselink teaches a "graphical user interface for the end users of physical processes." (Col. 8, lines 46-47; FIG. 1B). Hesselink defines "physical processes" as "physical, biological, and/or chemical processes" that occur within a laboratory setting. (Col. 4, lines 2-4). Thus,

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Hesselink clearly does not teach generating a graphical user interface for <u>controlling</u> at least one <u>pre-selected remote device</u> as recited in Claim 29.

Further, the Office Action admits that Crater does not teach Claim 29's limitations of a computer system including a remote device in communication with a central server via a communications network and obtaining a request to control at least one pre-selected remote device from a remote device by a central server. (Office Action, p. 12). However, the Office Action asserts that Hesselink resolves this deficiency. (Office Action, p. 12). Further, the Office Action asserts that it would have been obvious to one of ordinary skill in the art to modify Crater with the teachings of Hesselink to include a central server to control a pre-selected device. (Office Action, pp. 12-13). As discussed below, applicants respectfully disagree.

As described above, Hesselink is directed toward the control of physical processes in a laboratory via a computer network. (Col. 1, lines 10-13). Hesselink teaches that a client computer 118 communicates over a network 50 with a connection server 114. (Col. 4, lines 38-40; FIG. 1B). The connection server 114 in turn communicates with a lab server 112. (Col. 4, lines 60-63; FIG. 1B). Hesselink further teaches that the lab server 112 broadcasts data from the physical processes and controls the physical processes based on requests from the client computers 118. (Col. 4, lines 49-54). Thus, because the client requests relate to the control of experimental processes in a laboratory, Hesselink clearly does not teach "obtaining a request to <u>control</u> at least one <u>pre-selected remote device</u> from a remote device by a central server" as recited in Claim 29.

To establish a prima facie case of obviousness of a claim, the prior art references must teach or suggest each and every element as set forth in the claim. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). Applicants respectfully submit that Crater and Hesselink, alone or in combination, fail to teach or suggest each and every element as set forth in Claim 29.

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As explained above, Crater and Hesselink, either alone or in combination, fail to teach or suggest at least "generating a graphical user interface for controlling at least one pre-selected remote device" and "obtaining a request to control at least one pre-selected remote device from a remote device by a central server" as recited in the Claim 29. Accordingly, applicants respectfully request withdrawal of the pending rejection under 35 U.S.C. § 103 with regard to Claim 29.

C.   Claims 2-24, 26-28, 30-36, and 38-40

Dependent Claims 2-16, 19, 23-24, 26-27, and 38-40 were rejected under 35 U.S.C. § 102(e) as anticipated by Crater. Additionally, the Office Action rejected applicants' Claim 17 under 35 U.S.C. § 103(a) as obvious over Crater in view of Amini. Claims 18 and 20 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Amini and further in view of Brush. Claims 21 and 28 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Lemons. Claim 22 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Nail. Claims 30-31 and 35-36 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink. Claims 32 and 34 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink and further in view of Lemons. Claim 33 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view Hesselink and further in view of Launey. Because a dependent claim carries each and every limitation of the claim it depends on, the references, either alone or in combination, fail to teach or suggest each of the limitations as discussed above. Applicants further submit that the additional cited references fail to address the deficiencies associated with Crater. Accordingly, for this reason, applicants respectfully submit that the rejection of Claims 2-24, 26-28, 30-36, and 38-40 is in error and request that it be withdrawn.

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CONCLUSION

Based on the above-referenced arguments, applicants respectfully submit that all pending claims of the present application are patentable, nonobvious, and allowable over the cited and applied references, either alone or in combination. Because the cited and applied references, either alone or in combination, fail to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device, applicants respectfully request withdrawal of the rejections of the claims and allowance of the present application.

If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.Respectfully submitted,

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